FACTUAL RÉSUMÉ

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED

UNITED STATES OF AMERICA v. DILLON ALEX STEELE NO. 2:15-CR-001-C - AMARILLO DIVISION - NORTHERN DISTRICT OF TEXAS

SEP - 2 2015

CLERK, U.S. DISTRICT COURT

INDICTMENT:

TO BE ARRAIGNED ON COUNT ONE OF THE

INDICTMENT - Charging a violation of Title 18, Unite

States Code, Section 876(c) – Mailing Threatening

Communications

MAXIMUM PENALTY:

Imprisonment for a period of not more than ten years. A fine of not more than \$250,000.00, or both. A term of supervised release of up to three years, which follows a term of imprisonment. If the defendant violates the conditions of supervised release, he could be imprisoned and subject to additional terms of supervised release and imprisonment as determined by the Court in accordance with law.

MANDATORY

ASSESSMENT:

\$100.00

PLEA AGREEMENT:

As set forth in the Plea Agreement letter attached hereto and

incorporated herein.

ELEMENTS OF

THE OFFENSE:

Mailing Threatening Communications

First: That the defendant knowingly deposited, or caused to be delivered, in the mail, for delivery by the United States Postal Service, a communication addressed to any other

person containing a threat, as charged;

Second: That the defendant transmitted the communication for the purpose of issuing a threat or with knowledge that the

communication will be viewed as a threat:

Third: That the nature of the threat was to kidnap any person or to injure the person of the addressee or of another; and



Fourth: That the communication was addressed to a United States judge or another official who is covered by Title 18, United States Code, Section 1114.

FACTS:

On April 11, 2014, the judicial paralegal for United States District Court Judge Mary Lou Robinson received a letter postmarked April 10, 2014. The letter was from Dillon Steele and addressed to "Hon. Mary Lou Robinson, Federal Courthouse, 205 E. 5th St., Rm 226, Box F-13248, Amarillo, Tx, 79101." In the letter, the writer stated (in relevant part) "...I'm gonna kill everyone at the courthouse, and the federal building, I'm gonna blow everything up sky high, may-be after nothing but death and destruction someone will listen then!"

On April 15, 2014, special agents of the Federal Bureau of Investigation (FBI) interviewed Dillon Alex Steele at the Potter County Jail, Amarillo, Texas. The FBI special agents informed Steele of his constitutional rights and he agreed to waive those rights and speak with the agents. Steele admitted that he wrote the letter described in this factual resume to Judge Robinson. Steele stated that he didn't intend to carry out his threats, but just to call Judge Robinson's attention to perceived civil rights violations at the Potter County Jail.

Subsequent analysis by the FBI Laboratory's DNA Casework Unit and Latent Prints Operations Unit confirmed that Steele's DNA and fingerprints were on the letter and envelope described in this factual resume.

Steele admits that he knowingly deposited, or caused to be delivered, in the mail, for delivery by the United States Postal Service, a communication addressed to United States District Court Judge Mary Lou Robinson containing a threat, as charged. Steele admits that he transmitted this communication with knowledge that his communication would be viewed as a threat. Steele admits that the nature of the threat was to injure the person of the addressee or of another, in that Steele threatened to detonate an explosive

8/25/15

device at the courthouse, causing death and destruction.

The above facts are true and correct:

Dillon Alex Steele

Defendant

Helen M. Liggett

Attorney for Defendant

Date

Date